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March 2, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

**Re: General Waste Discharge Requirements for Composting Operations–
Comments on Draft EIR**

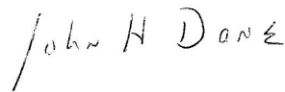
Dear Ms. Townsend:

CRRA appreciates the opportunity to comment on the CEQA Draft Environmental Impact Report (EIR) and regulatory language for the proposed General Waste Discharge Requirements (WDRs) for Composting Operations (Draft Order WQ-2015-XXXX-DWQ). CRRA supports the State Water Resources Control Board (SWRCB) in its efforts to protect water quality throughout the California. The effort is critical to meet the AB 341 75% recycling goal, CalRecycle's Strategic Directive 6.1, and other sustainability goals of the state.

CRRA agrees with the comments submitted on March 2, 2015 by the California Organics Recycling Council (CORC) regarding three main issues: economic analysis, the exemption of chipping and grinding facilities, and the definition of food material.

CRRA urges you to thoroughly consider the merit of CORC's comments.

Sincerely,



John H. Dane, CAE
Executive Director

The views expressed in this letter do not necessarily represent those of the Sponsors listed above.



CRRA is California's state-wide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. A 501(c)(3) organization, CRRA is dedicated to achieving environmental sustainability in and beyond California through Zero Waste strategies including product stewardship, waste prevention, reuse, recycling and composting. CRRA advances local, regional and state-wide waste reduction efforts which result in critical environmental and climate protection outcomes. Our members represent all aspects of California's reduce-reuse-recycle-compost economy. They work for cities and counties, as well as hauling companies, material processors, non-profit organizations, state agencies, and in allied professions.